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**STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS
SECURITIES DIVISION**

IN THE MATTER OF DETERMINING
whether there has been a violation
of the Franchise Investment Protection Act of the
State of Washington by:

SpanishFUN LLC; Robert Lasseter,

Respondents.

Order Number S-06-072-06-FO01

ENTRY OF FINDINGS OF FACT AND
CONCLUSIONS OF LAW AND FINAL ORDER
TO CEASE AND DESIST

THE STATE OF WASHINGTON TO:

Robert Lasseter
SpanishFUN LLC
334 East Lake #226
Palm Harbor, FL 34685

On July 11, 2006, the Securities Administrator of the State of Washington issued S-06-072-TO01,
hereinafter referred to as "Summary Order," against SpanishFUN LLC and Robert Lasseter.

The Summary Order, together with a Notice of Opportunity to Defend and Opportunity for Hearing,
hereinafter referred to as "Notice of Opportunity for Hearing" and an Application for Adjudicative Hearing,
hereinafter referred to as "Application for Hearing," were served on SpanishFUN LLC and Robert Lasseter
on July 14, 2006 via certified mail. The Notice of Opportunity for Hearing advised SpanishFUN LLC and
Robert Lasseter that a written application for an administrative hearing on the Statement of Charges must be
received within twenty days from the date of receipt of the notice. SpanishFUN LLC and Robert Lasseter
returned the Application for Hearing on July 25, 2006, and declined to request a hearing.

1 In lieu of requesting a hearing, Robert Lasseter submitted a statement for consideration by the
2 Securities Administrator. In the statement, Robert Lasseter stated that SpanishFUN agreed to abide by the
3 cease and desist order until registered in Washington, but argued that it had made appropriate disclaimers in
4 its offering materials.

5 Finding no grounds for amendment of the Summary Order, the Securities Administrator therefore
6 adopts as final the findings of fact and conclusions of law as set forth in the Summary of Order.
7

8 The Securities Administrator makes the following findings of fact and conclusions of law:

9 **FINDINGS OF FACT**

10 Respondents

11 1. SpanishFUN LLC (“SpanishFUN”) is a Tennessee Limited Liability Company with its
12 principal place of business at Palm Harbor, Florida. SpanishFUN maintains a website at
13 <http://www.spanishfun.net>.
14

15 2. Robert Lasseter (“Lasseter”) is Manager of SpanishFUN LLC.

16 Nature of the Offering

17 3. Respondents caused to be placed on the internet at <http://www.spanishfun.net> an advertisement
18 for a SpanishFUN franchise opportunity which involves teaching Spanish classes at preschools and child
19 care centers.

20 4. On June 26, 2006, a Washington resident received a franchise information packet in the mail
21 from SpanishFUN.
22

23
24 ENTRY OF FINDINGS OF FACT AND
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1 5. The information packet sent by SpanishFUN contains materials describing the franchise
2 opportunity. The materials contain representations about the franchise opportunity, including, but not
3 limited to, that the cost of the SpanishFUN opportunity would be \$14,900 and would include an exclusive
4 territory, teaching aids, equipment, supplies, a marketing plan, and a three day in-home training program.
5 Purchasers of the franchise are required to pay a monthly fee of \$195 for continuing support. The
6 information packet also contains a "Next Step" checklist inviting the Washington resident to call 615-692-
7 2290 or 877-SPANFUN to determine whether his or her exclusive territory is still available. A handwritten
8 note asks the Washington resident to review the materials and call with any questions.

9 6. In connection with the offer of the franchise opportunity, Respondents failed to provide the
10 Washington resident with material information regarding the purchase of a SpanishFUN franchise,
11 including a Uniform Franchise Offering Circular (UFOC) with financial statements of SpanishFUN.
12 Respondent Robert Lasseter also failed to disclose that the Federal Trade Commission had brought action
13 against him as the owner and president of CompuChild USA, Inc., his previous business, and that he was
14 found liable on July 1, 2005 for 56 violations of the federal franchise disclosure laws.
15

16 7. As of the entry date of this order, Respondents were continuing to advertise their franchise
17 opportunity at spanishfun.net.

18 Registration Status

19 8. SpanishFUN LLC is not currently registered to sell its franchises in the state of Washington
20 and has not previously been so registered.
21

22 Based upon the above Findings of Fact, the following Conclusions of Law are made:
23

24 ENTRY OF FINDINGS OF FACT AND
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1
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3 **CONCLUSIONS OF LAW**

4 1. The offer or sale of franchises described above constitutes the offer or sale of a franchise as
5 defined in RCW 19.100.010(16) and RCW 19.100.010(4).

6 2. The offer or sale of said franchises was in violation of RCW 19.100.020 because no
7 registration for such offer or sale is on file with the Securities Administrator.

8 3. The offer or sale of said franchises was in violation of RCW 19.100.170 because as set forth
9 in paragraph 6 of the Tentative Findings of Fact, Respondents made untrue statements of material fact or
10 omitted to state material facts necessary in order to make the statements made, in light of the circumstances
11 under which they were made, not misleading.
12

13
14 **FINAL ORDER**

15 Based on the foregoing:

16
17 NOW, THEREFORE, IT IS HEREBY ORDERED that SpanishFUN LLC; Robert Lasseter; and
18 their agents and employees, each cease and desist from offering and/or selling franchises in any manner in
19 violation of RCW 19.100.020, the section of the Franchise Investment Protection Act requiring registration.

20 It is further ORDERED that SpanishFUN LLC; Robert Lasseter; and their agents and employees,
21 each cease and desist from violation of RCW 19.100.170, the anti-fraud section of the Franchise Investment
22 Protection Act.
23

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1 This Order is entered pursuant to RCW 19.100.248 and is subject to the provisions of RCW 34.05.

2
3 **WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.**

4
5 DATED and Entered this 14th day of August, 2006.

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11 MICHAEL E. STEVENSON
12 Securities Administrator

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14 Approved by:

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